

The Maglione Firm, P.C.

ATTORNEYS AT LAW

186 Clinton Avenue, 2nd Floor

Newark, New Jersey 07108

Ph: (973) 645-0777; Fax: (973) 645-0377

Attorneys for Plaintiff, Kwadir Felton

KWADIR FELTON,

Plaintiff,

vs.

**CITY OF JERSEY CITY, JERSEY
CITY POLICE CHIEF, THOMAS J.
COMEY, JERSEY CITY POLICE
DIRECTOR, SAMUEL JEFFERSON,
JERSEY CITY POLICE SERGEANT
THOMAS McVICAR, JERSEY CITY
POLICE OFFICER DWAYNE
DOWELL, JERSEY CITY POLICE
OFFICER CARLOS LUGO, ABC
CORPORATIONS (#1 thru #10), JOHN
DOES (#1 thru #10) and JANE DOES
(#1 thru #10),**

Defendants.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Hon. William J. Martini, U.S.D.J.

Civil Action No. 2:11-7492 (WJM-MF)

Document Filed Electronically

**NOTICE OF MOTION TO STAY
CIVIL PROCEEDINGS**

TO: Michael Dougherty, Esq.
Assistant Corporate Counsel
City of Jersey City
280 Grove Street
Jersey City, NJ 07302

SIR:

PLEASE TAKE NOTICE that the undersigned will apply to the above named Court, Newark, New Jersey, on Monday, October 1, 2012, at 9:00 a.m., for an Order granting plaintiff Kwadir Felton's Notice of Motion to Stay the Civil Proceedings in this Matter until the Criminal Case Against the Plaintiff is Resolved.

The undersigned shall rely upon the attached Brief as well as the Certifications of Lora B. Glick, Esq. and Brooke M. Barnett, Esq. in support hereof.

A proposed form of Order is enclosed herewith.

SCHEDULED DATES

ARBITRATION: None

TRIAL: None

CALENDAR CALL: None

The Maglione Firm, P.C.
Attorneys for Plaintiff

/s/ Lora B. Glick

LORA B. GLICK, ESQ.

Dated: September 3, 2012

CERTIFICATION

I hereby certify that the original of the within Notice of Motion and supporting papers have been filed with the Clerk of the United States District Court, Newark, New Jersey as well as upon all defendants in this matter via electronic filing.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made me are willfully false, I am subject to punishment.

The Maglione Firm, P.C.
Attorneys for Plaintiff

/s/ Lora B. Glick

LORA B. GLICK, ESQ.

Dated: September 3, 2012

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ORDER

This matter having been opened to the Court by Lora B. Glick, Esq. of **The Maglione Firm, P.C.**, attorneys for plaintiff, Kwadir Felton, on a Notice of Motion for an Order granting a stay of the civil proceedings in this matter until the criminal case against the plaintiff is resolved; and it appearing to the Court that due notice of this Motion has been given to the named defendants, and the Court having considered the matter and good cause appearing;

IT IS on this day of , 2012

ORDERED that plaintiff's Notice of Motion to stay the civil proceedings in this matter until the criminal case against the plaintiff is resolved be, and the same hereby is GRANTED; and it is further;

ORDERED that a true copy of this Order shall be served upon all parties to this action within seven (7) days of the date hereof.

HON. WILLIAM J. MARTINI, U.S.D.J.

(Opposed)

(Unopposed)